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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN
BROADBENT; GINA ROHBOCK; NOLAN
BARLOW; JASON BLACK; MAY MUSSER;
HOLLY BISTLINE; LAWRENCE BARLOW;
STEVEN DOCKSTADER; MARVIN COOKE;
HELEN BARLOW; VERGEL BARLOW;
CAROLE JESSOP; BRIELL LIBERTAE
DECKER f/k/a, LYNETTE WARNER; AMY
NIELSON; SARAH ALLRED; THOMAS
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION
OF GINA ROHBOCK**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Gina Rohbock, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.
2. I am a Plaintiff in the above-captioned matter.
3. I make these statements based on my own knowledge and belief.
4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 27, 2022.
5. Based on my TVPRA claim against Warren Jeffs and trial testimony, I suffered damages as summarized in this Damages Declaration.
6. As I testified at trial, I was spiritually married on December 28, 2001, when I was 16-years-old. About 16 months later when I was 17, I left Colorado City, Arizona with my husband to work in various states cooking, feeding, cleaning and doing laundry for FLDS work crews.
7. Between 2003 and 2010, as I continued to work for work crews with which my family shared housing. I did my best to keep them fed. Despite my efforts, there was barely enough money to keep everyone fed. I knew that I had to care for these crews for the benefit of Jeffs and that my family and I would suffer even greater harm if I failed.
8. After working various jobs for church-controlled construction companies, my family and I were sent to Great Falls, Montana in May of 2008. In Montana, the FLDS were working on an Air Force Base. Because it was a government contract, Richard was given paychecks but had to turn them over to the Priesthood. Although his family did not get the income, my food stamps, which had increased over time, were cut back to \$150 a month because Richard's income was falsely reported on the company's books.

9. By 2009, however, I was so malnourished and sick that I had to be taken to Short Creek for several months to recover. Soon after arriving in Short Creek, an infection I had been fighting developed into various open sores on my breasts which seemed to be moving around and were difficult to control.

10. In 2010, I went back to Montana and continued to work full-time in support of the work crews for another five months. I was never paid for any of my labor or services. I would never have provided this work for Jeff's work crews if that had not been required.

11. Between April 2003 and May 2010, while I was on the road working for FLDS work crews, I worked an average of ten hours a day, seven days a week and was never paid. In 2009, however, I was so malnourished and sick that I had to be taken to Short Creek for about seven months to recover. In January 2010, I continued to work full-time in support of the work crews until May of that year when I was hospitalized. After I was well enough to work, I continued to support FLDS work crews until Spring 2011 but due to memory loss I don't recall those details and have not included that additional work in this Damages Declaration.

12. Based on a conservative estimate, I worked approximately 77 months between April 2003 and May of 2010 and was not paid for any of my labor or services. To estimate the withheld wages that I was not paid for this work, for purposes of this Damages Declaration, I will conservatively use a 40 hour workweek and an average hourly rate of \$7.25 based on the current minimum wage. This estimate is more accurate than the partial summary in trial Exhibit A.

13. While I was under Jeffs' control, Jeffs knowingly forced me and threatened me with

force both to myself and to my children to obtain my labor and services. Jeffs also knowingly used physical restraint and the threat of physical restraint of me and my children by confining us in various homes with work crews to obtain my labor and services. Jeffs did this knowingly using his fraudulent scheme, plan and pattern to cause me to believe that if I did not provide labor and services for him, my children and I would suffer serious harm and physical restraint.

14. I was not paid for any of this forced work and estimate that my wages were withheld for 342 weeks (79 months x 4.33 weeks per month) resulting in withheld wages of \$99,180 (342 weeks x 40 hour workweeks x \$7.25 an hour).

15. The necessities a child would need should have been provided to me until I turned 18 on October 18, 2003. Even after my 18th birth date, I often did not have enough to eat and was eventually starving. Nevertheless, I liberally estimate the value of the necessities I received or should have received during the period after I turned 18 until May of 2010 to be valued at \$23,700 (\$300 x 79 months), which amount may, in the Court's discretion, be deducted from my economic damages.

16. As a result of being trafficked, I suffered severe malnutrition, infections, five surgeries and intensive mental health intervention for my emotional injuries. I conservatively estimate the cost of this medical care at \$90,000. I have also been in weekly counseling for 10 years and understand that the counseling will continue. Based on 10 years of weekly therapy, at an estimated cost of \$110 per session, my therapy bills to date are \$57,200. Accordingly, I estimate that my total medical bills to date are at least \$147,200.

17. My economic damages after deductions for the necessities provided to me (\$99,180 -


\$23,700 + \$147,200), therefore, amount to \$222,680.

18. In terms of general or non-economic damages, I testified at trial about what I went through and the resulting injuries. Based on that, I ask for general damages in the amount of \$3,000,000.

19. Therefore, I estimate that my total economic and non-economic damages are at least (\$222,680 + \$3,000,000) \$3,222,680.

20. Finally, I request an award of punitive damages in the amount of three times my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.

DocuSigned by:

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Gina Rohbock